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LETTER DISCUSSING PROPER SUBMITTAL TECHNIQUES FOR FUTURE ROY F. WESTON
REPORTS NWS EARLE NJ

2/5/1997

STATE OF NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION



State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.
Commissioner

FEB 05 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO. P 170 079 730

Lawrence Burg
Naval Weapons Station Earle
201 Highway 34 South
Building C-54
Colts Neck, NJ 07722-1901

Dear Mr. Burg:

Re: UST Closure Report for USTs C-23, C-54, C-19 and C-500
Colts Neck Twp., Monmouth Co.

The New Jersey Department of Environmental Protection (Department) has reviewed the above referenced report, prepared by Roy F. Weston Inc. on behalf of the Naval Weapons Station Earle. The Department has agreed with Weston's conclusions regarding no further action for these USTs, however if subsequent reports are to be submitted in this fashion, they will not be approved. The reasons for this are as follows:

1. Weston regards this submittal as a "stand alone document" when the document only contains site drawings, a closure approval and correspondence. This hardly qualifies this submission as a "stand alone document".
2. Weston has justified the abandonment in place of C-19 and associated piping by attaching a closure approval to this submission. This is inappropriate, as stated in my correspondence dated May 30, 1996 to Brian Helland, of NORTHDIV, an engineer's certification is required to justify abandonment in place. It is noted that Weston has provided the proper engineer's certification for abandoning Tank 500 in place. This certification was dated February 9, 1996.
3. The Department would interpret a "stand alone document" for this submission as a report that included the draft report with all comments incorporated, all proper closure approvals, engineering certifications and revised drawings. Thus a reader can interpret the entire UST abandonment/removal effort in one report.

If you have any questions, please call me at (609)-633-7327.

Sincerely,

Bob Marcolina

Bob Marcolina, Case Manager
Bureau of Federal Case Management

c: Brian Helland, NORTHDIV